

**UNC Workgroup 0819 Minutes
Establishing/Amending a Gas Vacant Site Process
10:00 Thursday 27 July 2023
via Microsoft Teams**

Attendees		
Bob Fletcher (Chair)	(BF)	Joint Office
Ben Mulcahy (Secretary)	(BM)	Joint Office
Andy Eisenberg	(AE)	Eon Next
Andy Clasper	(AC)	Cadent
Anne Jackson	(AJ)	Gemserv (PAFA)
Charlotte Gilbert	(CG)	BU-UK
Daniel Wilkinson	(DW)	Edf
David Addison	(DA)	CDSP (Xoserve)
David Mitchell	(DM)	SGN
Edd Green	(EG)	Eon Next
Fiona Cottam	(FC)	CDSP (Xoserve)
Gurvinder Dosanjh	(GD)	Cadent
Harry Hailwood	(HH)	Brook Green Trading
James Lomax	(JL)	Cornwall Insight
Jenny Rawlinson	(JR)	BU-UK
Kathryn Adeseye	(KA)	CDSP (Xoserve)
Kevin Clark	(KC)	Utilita
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Lee Greenwood	(LG)	British Gas
Mark Jones	(MJ)	SSE Energy Supply
Oorlagh Chapman	(OL)	Centrica
Slama Akhtar	(SA)	Northern Gas Networks
Steve Mulinganie	(SM)	SEFE
Tom Stuart	(TSt)	Wales & West Utilities
Tracey Saunders	(TS)	Northern Gas Networks

The Workgroup Report is due to be presented at the UNC Modification Panel by 19 October 2023.

Please note these minutes do not replicate/include detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of all papers are available at: <https://www.gasgovernance.co.uk/0819/270723>

1.0 Introduction and Status Review

Bob Fletcher (BF) welcomed everyone to the meeting and gave a brief overview of the scheduled items for discussion.

1.1. Approval of Minutes (22 June 2023)

Kathryn Adeseye (KA) had submitted an amendment request to the Joint Office for the Workgroup 0819 minutes from 22 June 2022 regarding the checks the CDSP would perform between the 'first qualifying No Access visit date' provided by the Shipper and the 'date the vacant site request was received, clarifying that any retrospective period would only be checked for meter readings between the two dates.

BF asked the Proposer if the requested change was acceptable to him, which Lee Greenwood (LG) confirmed. With no other comments or objections from the Workgroup the minutes, so amended, were approved.

1.2. Approval of Late Papers

BF confirmed that there were no late papers to report.

1.3. Review of Outstanding Actions

Action 0601: Proposer (LG) to provide amended Modification Proposal and Guidance Document defining which criteria the CDSP are to use to accept Vacant status requests and when to apply them.

Update: Lee Greenwood (LG) confirmed an amended Modification has been provided for the meeting.

Action closed.

Action 0602: CDSP (ER) to provide awareness of Modification 0819 in REC space regarding GES and DAM

Update:

KA confirmed this action had been completed. SM suggested that the action be kept open to ensure the Workgroup obtains updates on the REC aspect in subsequent meetings.

Action retained for a progress update.

2.0 Amended Modification

Lee Greenwood (LG) advised that **Business Rule 1** had been amended to address the concerns discussed in the last Workgroup where the meter criteria was only specified in the Guidance Document, which as being outside of the UNC, would have differing governance. He also highlighted the 'avoidance of doubt' statement added stating that IGT sites are included in the Modification's scope but that there were no changes to IGT-specific charges.

Business Rule 5 had an exit trigger (No 5) clarified and now reads 'Read relevant to period of vacancy' to be clear that meter reads (such as replacement reads) submitted that are for dates outside the period would not trigger an exit.

LG talked through the 'Rejection of Vacant Status' (Page 2 of the Vacant Site Guidance Document) stating that once a Shipper notifies the CDSP of the intent to make a site Vacant the CDSP will validate against the criteria listed between 1 and 5.

KA questioned if this was true of point 5d (*Standard Meter (DUMB) or Non-active AMR Meter or SMETS Meter with a Non-Active DCC Flag*) as she did not believe such details were held on the CDSP systems, and they were thereby unable to validate these criteria.

LG agreed, confirming that the CDSP would validate criteria 1 through to 5c only.

Steve Mulinganie (SM) suggested the sentence stating that "...the CDSP will retrospectively check" perhaps should read "...criteria 1 to 4 and 5a to 5c inclusive."

Tracey Saunders (TS) asked if a ROM already existed for this Modification, as it seemed to require a lot of change.

KA confirmed that a ROM had been produced but a revised version was to be produced for presentation at the August Workgroup meeting.

LG resumed the review of the Rejection of Vacant Status, noting that for proposed criteria 7 the CDSP will retrospectively check from the first qualifying no-access visit date up to and including the date the vacant site request is received.

KA questioned if that validation was linked with criteria 7, which was regarding the Shipper having no access to the Site, which the CDSP could not confirm.

LG agreed that the link between reads being present on the CDSP system and Shipper access to the site was only loosely linked.

SM noted that the title was “Rejection of Vacant Status” and details specifics that a party performs but there was no detail as to what the outcome would be, presumably rejection, but this was not confirmed. He suggested it would be helpful to clarify this for parties using this Guidance Document at a later date,.

LG agreed and committed to change this accordingly.

New Action 0701: Proposer (LG) to confirm the outcome of failing to meet the criteria specified under “Rejection of Vacant Status” in the Guidance Document.

TS noted the requirements detailed in “Maintain Vacant Status” which the Shipper must be able to demonstrate, asking if something is submitted for some form of checking or if records are kept to produce when challenged. She also asked for clarification as to whom would be checking this and if it was to be approached on an exception process.

LG confirmed that it was down to the Shipper to record that all these checks were being made, so that, should, for example, PAC monitoring raises some questions, the Shipper can duly demonstrate their evidence.

KA stated that Elly Rogers had shared a copy of related PAC reporting being developed in an earlier Workgroup.

TS asked if it was worth mentioning that PAC will monitor this.

SM responded that the Shipper will be warranting this. It was PAC’s decision on how they monitor things.

Lousie Hellyer (LH) suggested it may be better to say that this will be visible to PAC.

SM commented that it could state that it is an area that falls into PAC visibility, and Shippers may be called upon to justify their position.

LG asked if this should be stated at the beginning of the document, which SM confirmed would make it clear and TS agreed would be useful in the subsequent Consultation stage in that respondents would be able to clearly see the issue had been considered.

New Action 0702: Proposer (LG) to add a statement at the beginning of the Guidance Document that sites designated as Vacant are an area that falls into PAC visibility, and Shippers may be called upon to justify their position.

LG referenced decisions discussed at the previous Workgroup and related dialogue around the Legal Text which originally led to the belief that an IGT-specific Modification would not be required. He advised that subsequent discussions had confirmed that an IGT-specific Modification was indeed required, so he did need to complete this too.

Jenny Rawlinson (JR) asked if there are any other instances where the DNOs alter their charging on their part of the network because of their arrangements with Shippers which would impact an IGT network. If there is an existing precedent, then an IGT Modification might not be needed.

David Addison (DA) asked if the question was if there is there any precedent of DNOs charging up to the CSEP charging point in the Code. He stated that Modification 0836S does exactly that in terms of the settlement matters as that effectively generates an adjustment to charges to

DNOs on energy but won't touch the IGT charges, with that being the part the IGTs levy, adding that he thought it to be a precedent that had occurred many times before.

JR agreed that it felt like that was the case, but as this was going to happen to an IGT site, and since with DNO sites the Shipper has to be proactive, they should do the same for any IGT sites, though she recognised the water was muddied with the CDSP acting on Shipper's part, she asked if the IGTs would expect a request.

LG advised that when he previously spoke to Anne Jackson on the matter it was recognised that the Legal Text would be at a part of the UNC that the IGT UNC does point to, but there are other parts that do not without an IGT Modification to correct the referencing, which was required to ensure all the correct parts point to the right place.

JR agreed, adding that it would need to ensure that it does not impact IGT charging.

KA commented that Dentons had indicated in earlier conversations that an IGT Modification might be required.

3.0 Review of draft Legal Text

Andy Clasper (AC) lead a review of the Legal Text, advising that there were two areas highlighted in yellow that mirrored the two changes to the Business Rules in response to the discomfort about pointing to the Guidance Document. He advised that UNC TPD Section G 10.1.1 now included specifying what a 'relevant' meter was for the purposes of Vacant site designation.

SM noted that the text "...is not an operational Smart Meter or Advanced Meter" could be read as an operational Smart Meter or an Advanced Meter.

AC agreed, stating that if it were an Advanced Meter, operational or not, it will be picked up, conversely if it was an operational Smart Meter, it would not be picked up.

SM questioned this, stating his understanding was that if either were operational, Smart or Advanced, meter reads could be obtained remotely, and the Vacant designation would not be applied or necessary. As such, the Legal Text should state that the criteria be that both are not operational.

AC suggested the Legal Text says 'neither' an operational Smart Meter or Advanced Meter.

SM agreed with this suggestion.

New Action 0703: Legal Text Provider (AC) to amend 10.1.1 to state "... is neither an operational Smart Meter or Advanced Meter."

AC finalised his review of Legal Text changes in noting the additional text in 10.4.1e where a meter read submitted by the Registered user has a read date on which the Supply Meter Point was registered as Vacant would cease the Vacant status.

SM asked if the intention was to state these sites are 'registered' as Vacant, noting it was described as 'classified' as Vacant in the Modification. He noted the use of the word 'registered' in the Legal Text was a little case 'r' anyway but was also of the impression that the Guidance Document referred to 'criteria'.

AC acknowledged that he had to go back to the Lawyer on the other point raised so will ask the question on this also.

New Action 0704: Legal Text Provider (AC) to confirm legal view as to refer to sites being 'registered' or 'classified' as Vacant.

AC added that all the changes made to the Legal Text had been updated in the Explanatory Table as well.

LG asked the Workgroup if the IGT UNC Modification had to be submitted first and if this Modification needed to wait until this was done.

BF advised that there were two factors to consider, is a combined Workgroup required or does this Modification's progression not impact the way they interact.

TS noted that as this Modification was to be Authority Directed it could be noted that there was an IGT UNC mirror Modification in the awareness that both Modifications would likely be completed and deferred for a decision whilst awaiting the Authority to progress them.

BF asked if the IGT Modification would also be Authority Directed.

JR responded that generally, IGT mirrors the UNC in governance, but if the Proposer can raise the IGT Modification fairly quickly there is no reason why these two cannot be implemented together, noting the fact that a presence of IGT Representatives here who would also be present at any related IGT meetings meant the IGT Modification could go to the IGT Modification Panel, likely have just the one Workgroup before returning to the IGT Modification Panel and on to Industry Consultation.

SM asked if the Proposer was comfortable with raising the IGT Modification and where it needs to be and what bits need to be targeted.

Anne Jackson (AJ) advised that she was talking on behalf of the IGT UNC and confirmed that she had spoken with the Proposer and the CDSP (ER) and had reviewed the legal text. She noted that the drafting required would be partially implemented with this Modification, meaning that an IGT Modification would be required to ensure all the drafting required is in the IGT UNC. She added that she would work with the Proposer to ensure the Solution implemented is the same as in this Modification and as such the IGT UNC Modification should not be up for debate, adding the question was more if it should be applicable to the IGTs.

LG confirmed this fitted with his understanding.

4.0 Development of the Workgroup Report

The Workgroup Report will be completed at the next meeting.

5.0 Next Steps

Proposer to make small amendments discussed to the Guidelines document and resubmit to Joint Office.

Amended ROM to be presented at next meeting.

Small changes required to the Legal Text

Workgroup Report anticipated to be reporting to Sept / Nov Modification Panel

6.0 Any Other Business

No other business was discussed.

7.0 Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/events-calendar/month.

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Programme
Thursday 10:00	5 pm	Microsoft Teams	<ul style="list-style-type: none">Review amended Modification Proposal and Guidance

24 August 2023	16 August 2023		<p>Document.</p> <ul style="list-style-type: none"> • Review amended ROM and LT • IGT Update • Conclusion of Workgroup Report.
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Distribution Workgroup Action Table						
Action Ref	Meeting Date	Minute Ref	Action	Owner	Reporting Month	Status Update
0601	22/06/23	1.3	Proposer (LG) to provide amended Modification Proposal and Guidance Document defining which criteria the CDSP are to use to accept Vacant status requests and when to apply them.	Proposer (LG)	July 2023	Closed
0602	22/06/23	2	CDSP (ER) to provide awareness of Modification 0819 in REC space regarding GES and DAM	CDSP (ER)	August 2023	Action retained for REC update.
0701	27/07/23	1.3	Proposer (LG) to confirm the outcome of failing to meet the criteria specified under "Rejection of Vacant Status" in the Guidance Document.	Proposer (LG)	August 2023	Pending
0702	27/07/23	1.3	Proposer (LG) to add a statement at the beginning of the Guidance Document that sites designated as Vacant are an area that falls into PAC visibility, and Shippers may be called upon to justify their position.	Proposer (LG)	August 2023	Pending
0703	27/07/23	3	Legal Text Provider (AC) to amend 10.1.1 to state "... is neither an operational Smart Meter or Advanced Meter."	Legal Text Provider (AC)	August 2023	Pending
0704	27/07/23	3	Legal Text Provider (AC) to confirm legal view as to refer to sites being 'registered' or 'classified' as Vacant.	Legal Text Provider (AC)	August 2023	Pending